



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

11/3/97

1419792

November 3, 1997

REPLY TO THE ATTENTION OF:

SR-6J

Scott Cornelius
Michigan Department of Environmental Quality, Superfund Section
P.O. Box 30426
Lansing, Michigan 48909

Re: Willow Boulevard/A-Site Proposed Plan

Dear Mr. Cornelius:

I and other EPA staff have reviewed the final Proposed Plan for the remedy selection at the Willow Boulevard/A-Site, which is Operable Unit #2 of the Allied Paper/Portage Creed/Kalamazoo-River Site. Attached is a compilation of the EPA comments on the draft Proposed Plan.

If you have any questions or comments, feel free to contact me at (312) 886-4740.

Sincerely yours,

A handwritten signature in cursive script that reads "Richard E. Boice".

Richard E. Boice
Remedial Project Manager

**COMMENTS ON DRAFT PROPOSED PLAN
AND SOME SUPPORTING DOCUMENTS
BY RICHARD BOICE**

General Comments:

Although MDEQ has provided EPA with many documents on the Allied Paper site, MDEQ has not provided the FFSs on the 12th Street Landfill and the Willow Boulevard/A-Site for review prior to submission of the Proposed Plans. Since the FFSs are the primary documents used to produce the Proposed Plans, it is unclear why they are not being provided to EPA prior to review of the Proposed Plans.

MDEQ should assure that the following guidance document is incorporated into the administrative record for this site: "Guidance on Remedial Actions for Superfund Sites with PCB Contamination," August 1990.

Introduction, Site-Location, Site Background, Remedial Investigation

The remedy selection is largely based on the comparison between this site and the King Highway Landfill. Discussion of this remedy selection approach and the similarities and differences between the sites, including similarities in location, history, landfill characteristics and operations, and waste characteristics should be incorporated into the discussions in the beginning of the Proposed Plan. Comparisons between the site locations, the site histories and processes that generated the wastes, size of the sites, the waste volume, waste characteristics, and PCB concentrations, should be included. Significant differences between the sites should also be highlighted, including the fact that a berm separates the King Highway Landfill from the Kalamazoo River, while no berm is present at Willow Boulevard (in fact at Willow Boulevard the paper residuals form a bank on the Kalamazoo River). At the King Highway Landfill the berms contain PCB-contaminated residuals, which have to be removed. Therefore, you need to identify whether PCB-contaminated residuals are present in the A-Site dikes. You also need to explain the difference between the berms at King Highway Landfill, and the dikes at the A-Site.

In the third paragraph of the Introduction, MDEQ and EPA do not "jointly" select the remedy at state enforcement lead sites. MDEQ selects the remedy, and EPA concurs or does not concur with MDEQ's selection.

The location of the site with respect to the flood plain of the Kalamazoo River should be identified.

In the third sentence of the Site Background Section, remove the word "unknowingly",

since it has probably not been determined whether or not the PRP knew that PCBs were present in the waste paper.

It should be explained that: MDEQ is overseeing implementation of the RI/FFS with support from U.S. EPA; and that MDEQ (in consultation with U.S. EPA) has approval authority for the RI/FFS.

An estimate of the quantity of waste below the ground water table should be provided. Contaminants other than PCBs should also be addressed if they are significant. If other contaminants have been found not to be significant, then this should be stated in the Proposed Plan.

Evaluation of Site Risks

In the list of similarities between the King Highway Landfill and the Willow Boulevard/A-Site, it should be added that the usages of the landfills are the same so the potential routes of exposure to humans and ecological receptors and the related exposure assumptions would be identical. Since dikes are not present at Willow Boulevard, you should clarify how the dike failure transport mechanism, which was identified in the King Highway risk assessment, applies to Willow Boulevard.

You should clarify exactly what are the remedial objectives for OU #2.

The Proposed Plan should note the potential for exposure to ecological receptors due to transport of the PCB contamination to the Kalamazoo River, and the results of the Ecological Risk Assessment.

There are a number of deficiencies in the risk assessment conducted for OU #3. These were identified in my May 5, 1997 letter regarding OU #4.

The estimated risks levels determined for this site should be stated (alternatively the Proposed Plan could state something to the effect that, based on the King Highway Landfill risk assessment, MDEQ has determined that unacceptable risks are present at this site). The reasonably anticipated future land use for the site should be stated in the Proposed Plan.

Presumptive Remedy Approach

The presumptive remedy guidance for municipal landfills is not directly applicable to this site, since municipal landfills typically contain a large percentage of residential wastes, and smaller percentages of industrial wastes. In contrast, this site is a monofill of

industrial waste. Therefore, some EPA reviewers have advised that the references to and use of the presumptive remedy guidance should be eliminated from the Proposed Plan. At a minimum, the references to the presumptive remedy guidance must be modified to indicate that the presumptive remedy guidance was used only as a tool to help develop an appropriate set of alternatives for this site (that is to screen out treatment and off-site disposal alternatives without a detailed evaluation). This is acceptable because this site is similar to a typical municipal landfill in that it contains a large volume of relatively low contaminated wastes, which normally makes treatment and off-site disposal alternatives excessively expensive.

Regarding the wording, in the last sentence, it would be more correct to refer to: "preventing physical contact with residuals and preventing the migration of PCB-contaminating materials to the Kalamazoo River" as performance objectives rather than "standards". A "standard" seems to imply a legal requirement - such as an ARAR. It should also be noted that the remedies for OU #2 and OU #3 will comply with the same ARARs.

Remedial Alternatives

Please note that the presumptive remedy guidance was only used as a tool, as explained above. Do not refer to Alternative 2 as the "presumptive remedy alternative", since the presumptive remedy guidance is not directly applicable. In addition, the specifics of Alternative 2 were not developed using the presumptive remedy guidance, but resulted from site specific considerations, and ARARs, especially NREPA requirements.

Alternative 2: Containment and Capping

It has previously been noted that at Willow Boulevard waste residuals, potentially containing PCBs, form a bank of the Kalamazoo River. A retention wall, such as sheet piling may not provide a sufficient barrier to migration of PCB residuals into the River. Therefore, further explanation is needed regarding how these residuals will be contained.

The description in bullet 2 should indicate the extent to which the dike and retention wall will protect the disposal areas from flooding from the Kalamazoo River. If this action is equivalent to the King Highway Landfill remedy, then the top of the dike and retention wall should be above the 100-year flood elevation, and so provide protection to the disposal areas up to a 100-year flood.

This Section should identify the criteria that will be used for the excavation of nearby

sediments, soils, and residuals, and explain how the criteria are derived. If this action is to be equivalent to the King Highway action, then the same cleanup criteria should be used. In addition, there should be some explanation of how sediments will be dewatered.

Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

Please provide EPA with an explanation of why the construction requirements in NREPA are not applicable to this site.

The Proposed Plan should either identify TSCA as a potential ARAR, or include an explanation of why TSCA is not an ARAR.

Reduction of Toxicity, Mobility or Volume through Treatment

Although the cap will reduce the mobility of the PCBs by reducing infiltration, it is not correct to state that the cap will "eliminate" mobility of the PCBs.

Evaluation of Alternatives and Selection of the Preferred Alternative

This Section needs to be rewritten to indicate it is MDEQ who is recommending Alternative 2 to the public, as their preferred alternative. The FFS can recommend a "preferred alternative", but can not conclude what the preferred alternative will be. As previously explained, Alternative 2 can not be referred to as "the presumptive remedy".

MDEQ selects the preferred alternative through a deliberative process that is based on review of all information relevant to the site. It is appropriate to list the major investigations, studies, and guidance documents that were considered or relied upon in the remedy selection process. However, to identify guidance documents, or the remedy selection for another site as forming the basis for the remedy selection is inappropriate, since it seems to indicate that MDEQ may not have considered other information. Moreover, MDEQ's determination is not one factor forming the basis for the preferred remedy, MDEQ's determination is the preferred remedy.